

**FITAPELLI & SCHAFFER, LLP**

Joseph A. Fitapelli  
Dana Cimera  
28 Liberty St. 30th Floor  
New York, NY 10005  
Telephone: (212) 300-0375

**JOSEPHSON DUNLAP, LLP**

Michael A. Josephson (Admitted *Pro Hac Vice*)  
Richard M. Schreiber (Admitted *Pro Hac Vice*)  
11 Greenway Plaza, Suite 3050  
Houston, Texas 77046  
Telephone: (713) 352-1100

**BRUCKNER BURCH, PLLC**

Richard J. (Rex) Burch (Admitted *Pro Hac Vice*)  
11 Greenway Plaza, Suite 3025  
Houston, Texas 77046  
Telephone: (713) 877-8788

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

HAROLD FORD, Individually and for Others  
Similarly Situated,

v.

WSP USA, INC.

Case No. 1:19-cv-11705-LGS

Jury Trial Demanded

**NOTICE OF PLAINTIFF'S MOTION  
FOR PRELIMINARY CERTIFICATION PURSUANT TO THE FAIR LABOR  
STANDARDS ACT, FOR COURT-AUTHORIZED NOTICE TO SIMILARLY  
SITUATED PERSONS, AND FOR EXPEDITED DISCOVERY**

PLEASE TAKE NOTICE that Plaintiff Harold Ford ("Plaintiff") will move this Court, before the Honorable Lorna G. Schofield, United States District Judge, at the United States Courthouse, 40 Foley Square, New York, NY 10007, at a time and date to be determined by the Court, for an Order granting conditional class certification, court-authorized notice, and expedited discovery, pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b), as well as such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff shall rely upon his Notice of Motion, Memorandum of Law in Support, and the Declaration of Richard Schreiber in

Support, together with the exhibits attached thereto.

Dated: New York, New York  
March 26, 2021

Respectfully submitted,

/s/ Michael A. Josephson

**Michael A. Josephson**

Texas State Bar No. 24014780

**Andrew Dunlap**

Texas State Bar No. 24078444

**Richard M. Schreiber**

Texas State Bar No. 24056278

**JOSEPHSON DUNLAP, LLP**

11 Greenway Plaza, Suite 3050

Houston, Texas 77046

713-352-1100 – Telephone

713-352-3300 – Facsimile

[mjosephson@mybackwages.com](mailto:mjosephson@mybackwages.com)

[adunlap@mybackwages.com](mailto:adunlap@mybackwages.com)

[rschreiber@mybackwages.com](mailto:rschreiber@mybackwages.com)

**AND**

**Richard J. (Rex) Burch**

Texas State Bar No. 24001807

**BRUCKNER BURCH PLLC**

11 Greenway Plaza, Suite 3025

Houston, Texas 77046

713-877-8788 – Telephone

713-877-8065 – Facsimile

[rburch@brucknerburch.com](mailto:rburch@brucknerburch.com)

**AND**

Dana M. Citera

**FITAPELLI & SCHAFFER, LLP**

Joseph A. Fitapelli

Dana M. Citera

28 Liberty Street, 30th Floor

New York, NY 10005

Telephone: (212) 300-0375

**ATTORNEYS IN CHARGE FOR PLAINTIFF  
AND PUTATIVE CLASS MEMBERS**

**FITAPELLI & SCHAFFER, LLP**

Joseph A. Fitapelli  
Dana Cimera  
28 Liberty St. 30th Floor  
New York, NY 10005  
Telephone: (212) 300-0375

**JOSEPHSON DUNLAP, LLP**

Michael A. Josephson (Admitted *Pro Hac Vice*)  
Richard M. Schreiber (Admitted *Pro Hac Vice*)  
11 Greenway Plaza, Suite 3050  
Houston, Texas 77046  
Telephone: (713) 352-1100

**BRUCKNER BURCH, PLLC**

Richard J. (Rex) Burch (Admitted *Pro Hac Vice*)  
11 Greenway Plaza, Suite 3025  
Houston, Texas 77046  
Telephone: (713) 877-8788

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

HAROLD FORD, Individually and for Others  
Similarly Situated,

v.

WSP USA, INC.

Case No. 1:19-cv-11705-LGS

Jury Trial Demanded

**CERTIFICATE OF SERVICE**

This is to certify that on **26th** day of **March 2021**, counsel for the Plaintiff filed the foregoing Motion for Certification of FLSA Collective via ECF, which will ensure delivery to the following counsel for Defendant:

Josephson Dunlap, LLP

/s/ Michael A. Josephson

Michael A. Josephson (Admitted *Pro Hac Vice*)  
Richard Schreiber (Admitted *Pro Hac Vice*)  
rschreiber@mybackwages.com  
Attorney for Plaintiff and Putative Class  
Members